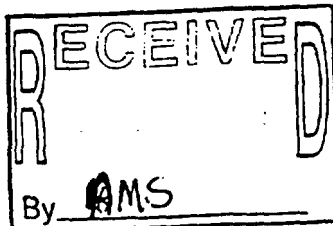


CC 92-237



Karlyn D. Stanley
Senior Attorney

Room 3-D
3033 Chain Bridge Road
Oakton, VA 22185
703 691-6047
FAX 703 691-6093



April 25, 1994

Mr. Robert J. Kennedy, III
Executive Director
Public Service Commission
1560 S. DuPont Highway
Dover, De 19901

REC-5 1994

FEDERAL BUREAU OF INVESTIGATION
OFFICE OF SECRETARY

Re: In the Matter of the Investigation
into the Competitive Provisions of
Intrastate Telecommunications Service
Through IntraLATA Presubscription -
PSC Regulation Docket No. 42

Dear Mr. Kennedy:

Enclosed for filing in the above-referenced case is
an original and nine (9) copies of a Joint Proposal on
Presubscription of MCI Telecommunications Corporation and
AT&T Communications of Delaware, Inc.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Karlyn D. Stanley".
Karlyn D. Stanley

KDS:an

Enclosure

cc: Service List

No. of Copies rec'd _____
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5-711-111,016AM

AUG - 5 1994

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE

IN THE MATTER OF THE INVESTIGATION INTO THE COMPETITIVE PROVISIONS OF INTRASTATE TELECOMMUNICATIONS SERVICE THROUGH INTRALATA PRESUBSCRIPTION	PSC REGULATION DOCKET NO. 42
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JOINT PROPOSAL ON PRESUBSCRIPTION
OF
MCI AND AT&T

In response to the Commission's Order No. 3735, MCI Telecommunications Corporation ("MCI"), and AT&T Communications of Delaware, Inc., present a joint proposal concerning the institution of one plus ("1+") equal access on a presubscribed basis in Delaware. AT&T and MCI recommend that the Commission institute equal access for the intraLATA toll market because of the benefits it will bring to the citizens of the State: increased efficiency, convenience and lower intrastate toll prices as a result of competition. In addition, intraLATA equal access will provide customers with more choice as well as more rapid deployment of telecommunications technology. The benefits of intraLATA equal access, and how it may be implemented in Delaware, are addressed in the following proposal.

I. THE IMPORTANCE OF INTRALATA EQUAL ACCESS TO DELAWARE.

A. Equal Access Is Required For A Competitive Marketplace.

To achieve a truly competitive marketplace for telecommunications services in Delaware, the Commission should institute intraLATA equal access (also referred to as intraLATA presubscription). IntraLATA equal access allows end users to use the familiar dialing pattern of "1" or "0" plus the telephone number being called to make intraLATA toll calls, without having to dial a Carrier Access Code ("CAC")--a 10XXX access code.¹ IntraLATA equal access is the process by which customers may select a Primary Interexchange and/or IntraLATA Carrier ("PIC") to carry their intraLATA calls on a 1+/0+ basis.

IntraLATA equal access will provide consumers with a choice of intraLATA carriers in the same manner as interLATA equal access. The Delaware consumer should not experience any perceptible differences between interLATA or intraLATA equal access when making 1+/0+ calls. Further, the quality of the connection after conversion to intraLATA equal access should be identical in every respect to that provided with interLATA equal access, i.e., there should be no difference

¹A plan has been developed by the Industry Carriers Compatibility Forum to increase the number of Feature Group D Carrier Identification Codes ("CICs") from three digits to four digits. The change is planned for the first half of 1995. Expanding the length of the CIC codes will require a change in the dialing sequence for Carrier Access Codes. CAC codes will change from their current five digit format (10XXXX) to a seven digit format (101XXXX). See In the Matter of Administration of the North American Numbering Plan, CC Docket No. 92-237, Phase One and Two (FCC 94-79), released April 4, 1994 at Para. 48. This expansion will exacerbate the dialing disparity in Delaware between BA-Del and the IXC's, in the absence of intraLATA equal access.

in the quality of the connection, dialing patterns, cost of access or presubscription methods.

B. Delaware Consumers Would Benefit From IntraLATA Presubscription.

The benefits of implementation of 1+/0+ intraLATA presubscription (equal access) for Delaware customers are:

1) **choice**--the opportunity to choose a carrier (or carriers) on a presubscribed basis, from among the Local Exchange Carrier ("LEC") and numerous interexchange carriers ("IXCs"), to handle their intraLATA (toll/local) calling; 2) **convenience**--the customer would dial fewer numbers than required today to reach carriers other than the LEC (Bell Atlantic-Delaware); and 3) **savings**--as competition for intraLATA toll calling increases between Bell Atlantic-Delaware ("BA-Del") and the IXCs, downward pricing pressure should result.

Once presubscription is instituted, Delaware customers would reach their designated carrier for intraLATA toll calling simply by dialing 1+ or 0+, instead of the current method of dialing a Carrier Access Code (10XXX) and 1+/0+ a 10 digit number to use a carrier other than BA-Del.² Customers still would be able to dial a 10XXX code to reach carriers other than their designated presubscribed carrier ("PIC").

²Delaware will have a statewide 10-digit dialing plan in place on January 7, 1995, as ordered by the Commission in PSC Docket 92-47.

II. SUCCESSFUL IMPLEMENTATION OF INTRALATA EQUAL ACCESS.

A. The Two-PIC Method Should Be The Preferred Presubscription Methodology.

There are three methods that are generally discussed for implementing intraLATA presubscription. The "Full Two-PIC" or "Two-PIC" method would allow a consumer to select his or her presubscribed intraLATA carrier from among all participating carriers. A second method, "Modified Two-PIC," would allow customers the limited choice of either the LEC or their selected interLATA carrier as their presubscribed intraLATA carrier. A third method, "Multi-PIC using the Advanced Intelligent Network," which is not currently available, would utilize an out-of-switch data base to route calls to their designated carrier. The Intelligent Network Architecture also would allow the LECs to introduce new services such as call routing features which, in other states, would be separately tariffed. It is unclear how such call routing features would be classified by Bell Atlantic-Delaware under S.B. 115.

Of the various customer selections that are technically possible, the Two-PIC method, which allows the customer to obtain 1+ intraLATA toll service from any available IXC or from the LEC currently providing service should be the preferred methodology. The Two-PIC method provides customers with optimum choice, is technically practicable, and can be implemented at a reasonable cost.

The Florida Commission's staff, which performed an extensive investigation of intraLATA presubscription last

year, reached this conclusion in its report, stating that, "[t]he consensus of the parties participating in this docket is that the two-PIC method is the preferred presubscription method for several reasons...The Advanced Intelligent Network method, while it sounds quite appealing, is still in the very early development stages. In light of these factors staff believes that the two-PIC method is the optimal method and may very well evolve as the national standard for intraLATA presubscription."³

B. Delaware Presubscription Should Be Completed By Year-End 1995.

The Commission should determine which option for presubscription in Delaware would be the most cost effective and timely to deploy. Implementation of a presubscription plan, if ordered, should be accomplished in 1995. Bell Atlantic-Delaware's existing plans for network upgrades and modernization should be taken into consideration as part of the implementation plan. Presubscription should not be stalled, however, by an argument for Multi-PIC when the Two-PIC method is both more readily available and cost effective. The technology necessary for AT&T switches to support the Two-PIC method will be available in Fourth Quarter 1994 for the 5E switch, and Second Quarter 1995 for the 1A switch. Ideally, implementation should begin in

³Florida Public Service Commission Docket No. 930330-TP-Investigation Into IntraLATA Presubscription, Memorandum of the Division of Communications and Division of Legal Services dated October 28, 1993, at 18-20.

January 1995, which would coincide with the implementation of the state-wide 10-digit dialing plan.

C. Market Forces, Rather Than Re-balloting, Should Be Allowed To Accomplish Presubscription In Delaware.

Under interLATA equal access conversion, the LECs were obliged to inform their customers of the equal access options available to them, and to allow customers to select a carrier for interLATA calls. That experience demonstrated that interLATA balloting was a costly, confusing and cumbersome process for everyone involved.⁴ Consequently, intraLATA balloting should only be undertaken in those exchanges that have not previously undergone interLATA equal access balloting and that would be introducing both interLATA and intraLATA equal access for the first time.

There should be no re-balloting of customers when intraLATA equal access becomes available. The appropriate approach for intraLATA equal access would be to rely on market forces, because carriers will have the incentive to attract customers. Re-balloting is likely to entail both considerable expense (estimated to be \$6.1 million in

⁴For interLATA presubscription, precise guidelines were determined by the Federal Communications Commission ("FCC"). These guidelines called for notification of IXC's six months prior to the equal access conversion date. The six month period allowed the placing of requests on the equal access ballot, printing of ballots, mailing of ballots to subscribers, returning of ballots, a second mailing to subscribers who did not respond to the first ballot, compiling of results of the two ballots, allocating the subscribers who did not respond to either of the two ballots (based on percentages developed from the ballots), processing changes in the subscriber's choice after balloting, entering the subscriber choices into the equal access data base field, and testing before conversion. Such a lengthy and complex process is not necessary to accomplish intraLATA equal access in Delaware.

Wisconsin)⁵ and customer confusion in exchanges that have completed interLATA equal access balloting.

Reliance upon market forces in exchanges that have already undergone interLATA equal access balloting would be consistent with the recommendation of the equal access study committee reports in Kentucky, Minnesota, North Dakota and Florida. The Florida Public Service Commission's Staff report concerning its Investigation into IntraLATA presubscription concluded,

Both LECS and IXCs agreed that re-balloting would be expensive and confusing to the end user. All parties agreed that market driven conversions (no balloting) would best serve the industry and end users by allowing each IXC and LEC to solicit residential and business customers directly. This would also allow the cost and customer confusion associated with re-balloting equal access customers to be avoided without reducing the benefits of competition.

Staff believes that customers in general do not understand interLATA versus intraLATA distinctions. Consequently, another round of balloting for intraLATA calls will confuse customers relative to their interLATA selection. Therefore, staff recommends that a carrier marketing approach (no balloting) be adopted for offices already converted to equal access, or already in the process of balloting for interLATA equal access. In addition, offices converting to interLATA equal access and intraLATA equal access at the same time should be balloted at the same time.⁶

⁵Investigation Into the Extent of Competition in the IntraLATA Toll Market and of the Level of Regulation for IntraLATA Telecommunications Service, State of Wisconsin PSC Docket 05-TI-119 (Phase II), Report of the Technical Conversion Committee ("TCC") to the Public Service Commission of Wisconsin, draft 11/1/93 at Attachment 2, "Summary of LEC Costs."

⁶Docket No. 930330-TP-Investigation into IntraLATA Presubscription, Memorandum of the Division of Communications and Division of Legal Services dated October 28, 1993, at 20-21.

This approach also would be consonant with likely customer preference. A poll of both residential and business customers taken in Southern New England Telephone ("SNET") territory indicated a strong preference for utilization of customer request procedures as opposed to balloting.⁷

D. IXCs Should Be Allowed To Carry Interstate, IntraLATA Toll Traffic Between Delaware And Pennsylvania On A Presubscribed Basis.

Although customers have been able, through presubscription, to select an IXC of their choice for interstate, interLATA "1+" toll calls, presubscription has not been available for intraLATA "1+" toll calls. Consequently, interstate, intraLATA "1+" toll calls are completed by a LEC, such as BA-Del, rather than turned over to the presubscribed interLATA IXC. The LEC process of screening and completing interstate, intraLATA MTS calls instead of turning them over to the IXC selected by the customer is sometimes referred to as "stripping." This practice applies to interstate, intraLATA toll calls between Delaware and Philadelphia.

The FCC has stated that such traffic is "clearly within" its jurisdiction, and has required that "full access charges be applied to the origination and termination of interstate, intraLATA services at both ends of a call."⁸

⁷See Southern New England Telephone's ("SNET's") "Proposed Interexchange Equal Access Implementation Plan," filed with the Connecticut Department of Public Utility Control on October 1, 1993.

⁸Application of Access Charges to the Origination and Termination of Interstate, IntraLATA Services and Corridor Services, Memorandum

Currently, the FCC is considering the broader policy questions raised by interstate, intraLATA toll traffic in a Notice of Proposed Rulemaking ("NPRM") released April 4, 1994.⁹ Comments are due in this FCC docket on June 7, 1994, and MCI and AT&T will recommend in their comments that they be permitted to carry interstate, intraLATA toll traffic, in order to reduce customer confusion and increase both competition and customer choice.

Serious issues are raised by the current LEC practice of "stripping" interstate, intraLATA toll calls. First, the current system defeats customer expectations that all of their interstate toll traffic will be carried by their presubscribed IXC. Second, BA-Del's rates to carry this traffic are generally higher than IXC rates. Third, to use their IXC and receive the benefit of lower rates, customers must dial a Carrier Access Code ("CAC") such as 10XXX, which is an inconvenience.¹⁰ Finally, because business customers with high calling volumes may have choices other than "1+" MTS for these toll calls (e.g., least cost routing equipment), such higher rates may be paid disproportionately by residential ratepayers. Therefore, it is clear that

Opinion and Order (FCC 85-172), released April 12, 1985 (paras. 7 and 9).

⁹In the Matter of Administration of the North American Numbering Plan, CC Docket No. 92-237, Phases One and Two (FCC 94-79).

¹⁰As explained in footnote 2, the Carrier Access Codes (CACs) will be expanded to a 7-digit format in early 1995, thus increasing this inconvenience.

consumer benefits would result if IXC's were permitted to compete for this traffic.

The FCC will decide the method by which IXC's will be permitted to carry interstate, intraLATA traffic, thus enabling Delaware customers to avail themselves of all their choices. In the meantime, the Delaware Commission can prepare the way for customer choice by requiring that intrastate, intraLATA presubscription be implemented on a full Two-PIC basis.

E. Presubscription Costs Must Be Defined Carefully.

Presubscription costs assigned to IXC's will have a major impact on their decision to enter, or not to enter, the intraLATA market in Delaware on a presubscribed basis. The first step to ensuring equitable recovery is to clearly identify, understand, and analyze those costs specifically related to intraLATA presubscription, as opposed to those costs associated with normal network upgrades, i.e., network modernization and normal capital planning projects, or IXC trunking requirements.

Only costs that can be identified as specifically associated with intraLATA presubscription should be included as incremental costs.¹¹ For example, only specific software costs associated with the feature package (if a switched-

¹¹The Jurisdictional Separations Procedures define equal access costs as those initial, incremental costs that are directly associated with providing equal access. Code of Federal Regulations, Title 47, Chapter 1-Federal Communications Commission. See also FCC Memorandum Opinion and Order, Docket DA-87-1662.

based solution) which provides the intraLATA presubscription capability should be included as recoverable costs. AT&T's Network Systems is currently quoting a figure of \$30,000 per switch for the software that will provide the Two-PIC capability. Northern Telecom has quoted an estimate of \$20,000 to upgrade its DMS10 (Digital) switch to full Two-PIC equal access and \$52,000 per switch for its DMS100 (Digital) switch. Thus, it is important to determine the number of switches for which BA-Del plans to purchase this feature, either from AT&T or another vendor, in order to determine whether the software costs included in BA-Del's intraLATA presubscription proposal or cost study are reasonable.¹²

Most of the costs associated with administration, customer education and balloting programs that are designed to implement intraLATA presubscription should be treated as an incremental expense and should be recovered equitably by all carriers. The following summarizes the costs that are directly related to the implementation of intraLATA presubscription:

Software--Specialized features to implement particular functions of services will be incorporated as part of a generic or feature package. Feature packages are usually "generic-specific" and will not function unless the particular generic for which they are designed or a higher (later) generic is present in the switch.

¹²A rough estimate of the total cost that might be expected to upgrade Delaware to Full 2-PIC equal access, based on a total of 42 switches, would be \$960,000.

Network--Costs for central office and outside plant facilities to perform activities associated with installation, testing, routing and translations. This category should not include costs associated with increased interoffice or IXC trunking requirements.

Administrative--Costs for setting up administrative, support and billing systems required to handle presubscription and intraLATA PIC-change requests (including personnel training and software modification costs).

Ballot/Customer Education--All costs associated with Commission-mandated customer education programs, balloting programs, and so forth.

III. PRESUBSCRIPTION WOULD NOT INAPPROPRIATELY INCREASE THE TOTAL COST OF PROVIDING TELECOMMUNICATIONS SERVICE IN DELAWARE.

A. The Total Cost Of Presubscription Would Not Be Significant.

Competition has required a complete restructuring of the telecommunications industry in the last decade. The implementation of interLATA equal access, and a number of other actions that facilitated customer choice resulted in long term benefits in efficiency, new services, lower prices and added value to customers. These actions were taken even though some expense was incurred by customers. There will be some additional cost associated with implementing customer choice for intraLATA "1+" calling, but those costs, when shared by all intraLATA toll services and amortized over an appropriate period of time (e.g., eight years) will be neither significant nor a burden on the total provisioning of telecommunications services in Delaware.

B. Properly Recovered, The Costs Will Not Affect Any Single Carrier Disproportionately.

The costs associated with presubscription should be appropriately recovered in a manner that spreads the cost over all originating switched access minutes from equal access exchanges generated on lines that are presubscribed to all carriers (BA-Del and IXC's alike) for intraLATA toll services. Recovery from all carriers is the same method used for the substantially larger costs associated with interLATA presubscription required by the decree and overseen by the Federal Communications Commission. The same rules should be applied in the intraLATA marketplace. All providers of intraLATA service should be required to help cover the total costs. Costs should be recovered through per-minute charges assessed on all minutes of intraLATA calling, including those carried by BA-Del. If cost recovery is undertaken appropriately, then the costs will be spread over a large base of minutes and the costs would not significantly affect the provisioning of telecommunications service.

Failure to levy the charge upon the incumbent LEC service provider, BA-Del, would unduly favor the LEC, distort the competitive forces at work in the intraLATA toll market, and impede the development of competition with its attendant benefits for consumers. If only new entrants to the intraLATA "1+" toll market have to bear the entire cost of intraLATA equal access implementation, an artificial cost advantage would be created favoring BA-Del. This method

would constitute both a barrier to entry and an improper handicapping among competitors.

Suggestions that such a preference would place the cost of equal access upon the IXCs that benefit from it miss the mark. Ultimately, the only group that benefits from the introduction of competition, or suffers due to the lack of it, are the end users of toll service. End users are also the ones who pay for equal access implementation, as well as other costs of service provisioning, because IXCs and LECs must pass the cost of doing business along to end users in their price structures. Furthermore, all end users will benefit from the availability of choice of carriers, whether they choose service from an IXC or BA-Del at any given point in time.

It is appropriate to assess costs on all market participants because it avoids a regulatory handicapping system that would give an artificial competitive advantage to the carrier that did not have to pay the cost that the rest of the competitors must pay. It also avoids the "free rider" situation for the LECs, such as BA-Del, that have enjoyed a monopoly position since divestiture.

C. Only Costs Directly Attributable To IntraLATA Presubscription Should Be Recovered.

As explained previously, the costs identified should be recovered from all toll carriers providing service in the intraLATA toll market, including BA-Del. Furthermore, care should be taken to ensure the costs recovered only include

the incremental costs associated with the provision of intraLATA equal access (e.g., excluding such items as the total cost of switch enhancements that benefit other services).

The cost associated with intraLATA presubscription needs to be understood and analyzed within the context of other network improvement projects that are underway. Specifically, the LECs are upgrading their networks over the next two years at the direction of the FCC, and BA-Del has committed to upgrade its network in conjunction with its Technology Deployment Plan filed with its election under S.B. 115. In fact, there are at least three external events scheduled for the 1995 time frame that are driving all LECs, including BA-Del, to upgrade their existing central office equipment to the appropriate generics. These activities are: Interchangeable NPA (INPA), Expandable Carrier Identification Codes (CIC), and 800 Number Portability Delay Requirements. With the exception of the network upgrade needed for 800 number portability delay requirements, these upgrade activities require the same software upgrade package as intraLATA presubscription.

These events provide further argument to move forward now with "1+" presubscription. Any expenses associated with upgrading the central office switches for these events should not be included in equal access cost recovery because they must be undertaken for reasons that are unrelated to intraLATA presubscription.

The cost of equal access presubscription should be levied upon originating minutes of use through an equal access recovery charge ("EARC"). Originating minutes of use represent the revenue-generating aspect of toll service provided using equal access. A recovery period of eight years for both recurring and non-recurring equal access expenses has been employed by the FCC and would appear reasonable for recovery of Delaware intraLATA equal access costs.

IV. OTHER REGULATING MECHANISMS ARE NECESSARY TO ALLOW EFFECTIVE INTRALATA TOLL COMPETITION.

A. Safeguards to Prevent Improper Pricing by BA-Del.

The continued existence of LEC bottleneck facilities requires the imposition of safeguards, including access charge imputation, unbundling of basic LEC network functions, and economically-based pricing of LEC service offerings. The issue of safeguards is familiar to the Commission from previous Delaware dockets, particularly Docket No. 33 and Docket No. 92-47. Safeguards will be addressed in Docket No. 41, the docket designated to develop implementing regulations under S.B. 115. The same safeguards that are critical in those proceedings are also essential to promote full and fair competition in the intraLATA toll market. BA-Del must impute the tariffed price of the access charges it levies on IXCs, in addition to other costs of providing the service, when developing prices for its own services, if BA-Del is not going to

realize an undue pricing advantage. BA-Del also should be required to unbundle the basic network functions that IXCs need in order to offer toll services that are competitive with BA-Del's intraLATA toll services. In addition, the pricing of the basic network functions used by IXCs should be based upon BA-Del's total service long run incremental costs ("TSLRIC"), and these services must be available for unrestricted resale. Cross-subsidization of intraLATA toll service by BA-Del's monopoly service can and should be avoided by ensuring that BA-Del's toll prices exceed their total service long run incremental costs (including the imputed access charges). These safeguards are necessary to permit the operation of competitive forces in the marketplace that will allow Delaware customers to realize the benefits of competition for intraLATA toll services.

B. Voluntary Carrier Participation.

Carrier participation in the intraLATA equal access presubscription process should be voluntary. This would be consistent with the procedure currently employed in connection with interLATA equal access.

V. PROCEDURAL ISSUES

The Commission should be able to determine whether to order intraLATA equal access in Delaware by reviewing the proposals submitted by the parties. Hearings on these proposals would create delay in implementing

presubscription, and probably would not add much more information on the subject. If the Commission's Staff has questions about the proposed plans, these issues could be handled in an industry workshop. AT&T and MCI would like the opportunity, however, to comment formally upon the presubscription proposal submitted by BA-Del.

VI. CONCLUSION

IntraLATA equal access is necessary to achieve a truly competitive marketplace for telecommunications services in Delaware. Delaware consumers would benefit from the increased choice, convenience and savings brought about by 1+/0+ intraLATA presubscription. The Two-PIC method, which allows the customer to obtain 1+ intraLATA toll service from any available IXC or from the LEC currently providing service, should be the preferred presubscription methodology. This methodology can and should be implemented fully in Delaware by BA-Del by December 1995. Market forces, rather than re-balloting, should be allowed to accomplish presubscription in Delaware. The experience gained from interLATA equal access balloting demonstrates that intraLATA re-balloting would likely be a costly, confusing and cumbersome process for everyone.

Presubscription would not inappropriately increase the total cost of providing telecommunications service in Delaware. Only costs directly attributable to intraLATA presubscription should be recovered, and these expenses

should be recovered equitably by all carriers. Properly recovered, the costs of presubscription will not affect any carrier disproportionately.

Certain other regulating mechanisms are necessary to allow effective intraLATA toll competition. The continued existence of LEC bottleneck facilities requires the imposition of safeguards, including access charge imputation, unbundling of basic LEC network functions, cost allocation, and economically-based pricing of LEC service offerings. Initially, competition will be enhanced by presubscription in Delaware, but competition will not be able to flourish without these essential safeguards.

The Commission has been progressive in its views of the changing role of regulation for telecommunications services. The Commission has endorsed the concept that increased competition in telecommunications services can bring significant benefits to Delaware citizens. Therefore, it is extremely important that the Commission reaffirm its commitment to competition in this proceeding and allow equal access through presubscription in the Delaware intraLATA toll market.

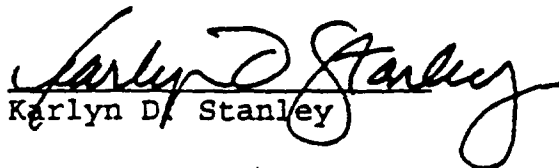
WHEREFORE, for the reasons stated above, AT&T Communications of Delaware, Inc., and MCI Telecommunications Corporation respectfully request that the Commission order

intraLATA equal access in Delaware, and require that Bell Atlantic-Delaware fully implement the presubscription plan designated by the Commission by the end of 1995.

Respectfully submitted,

AT&T COMMUNICATIONS OF
DELAWARE, INC.

By its attorney,


Karlyn D. Stanley

MCI TELECOMMUNICATIONS
CORPORATION

By its attorney,


Joan C. Campion *LSI KDS*

Date: April 25, 1994

CERTIFICATE OF SERVICE

PSC Regulation Docket No. 42

I hereby certify that I have this day served the Joint Proposal on Presubscription of MCI Telecommunications Corporation and AT&T Communications of Delaware, Inc. upon the parties of record in this proceeding by first-class mail, postage prepaid, or overnight mail at the addresses listed below:

G. Arthur Padmore
Hearing Examiner
Public Service Commission
P.O. Box 457
Dover, DE 19903

Keith Townsend, Esq.
U.S. Sprint Communications
Company Limited Partnership
Suite 1110
1850 "M" Street, N.W.
Washington, D.C. 20036

Mr. Robert J. Kennedy, III
Executive Director
Public Service Commission
1560 South DuPont Highway
P. O. Box 457
Dover, DE 19903

Joan Campion, Esq.
MCI Telecommunications Corp.
11th Floor
1133 19th Street, N.W.
Washington, D.C. 20036

Michael M. Tischer, Esq.
Public Service Commission
1560 South DuPont Highway
P. O. Box 457
Dover, DE 19903

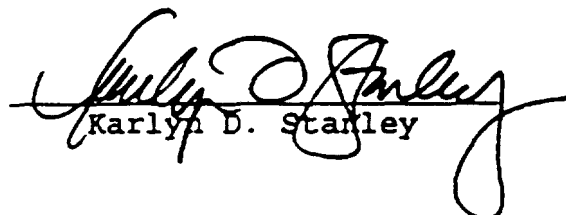
Patricia A. Stowell
Office of the Public Advocate
Carvel State Office Bldg.
820 N. French Street
Wilmington, DE 19801

George C. Hering, III, Esq.
Morris, James, Hitchens
and Williams
222 Delaware Avenue
P. O. Box 2306
Wilmington, DE 19899

Donald B. Coates
Chief, Finance & Accounting
Delaware Public Service
Commission
1560 S. DuPont Highway
P.O. Box 457
Dover, DE 19903

Leigh E. Buggeln, Esq.
Bell Atlantic Network
Services, Inc.
1710 H Street, N.W.
8th Floor
Washington, D.C. 20006

Joshua W. Martin, III, Esq.
The Diamond State Tel. Co.
901 Tatnall Street, 2nd Floor
Wilmington, DE 19801


Karlyn D. Stanley

April 25, 1994